

Before the

Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Amendment of Part 97 of the Commission's) RM-10413
Amateur Service Rules Governing)
Operating Privileges)
)

PERSONAL COMMENTS OF GREGORY J. BEAT, W9GB

OVERVIEW

These comments are in response to the ARRL proposal for "refarming" the existing HF "Novice sub-bands".

I. Discussion:

The ARRL petition does not address the implementation of new technologies as repeatedly requested by the Commission in WT Docket 98-143. It simply proposes to eliminate the Novice segments and reshuffle that spectrum among existing legacy modes. Rather than gain consensus, the ARRL polling method produced a popularity poll among several non-responsive (to 98-143) choices.

Rather than just "more of the same old stuff", I propose that the Commission take this opportunity to provide the Amateur Radio service with a new incentive to concentrate on paragraph 97.1(b) of the Commission's Rules.

97.1(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

I agree that the declining Novice license population no longer justifies a significant portion of the Amateur spectrum as a "reservation" for improving Morse skills, and that these "reservations" have outlived their regulatory purpose. These 50-year old "reservations" provide an opportunity for conversion to current and future purposes which will ensure that the Amateur Radio service continues in the future our "proven ability to contribute to advancement".

II Proposal:

A. To "de-populate" the current Novice segments, I propose that all Novice (and Technician with code credit) licensees be authorized to use Morse code in the same band segments now authorized for General class licensees.

B. I propose that the current Novice sub-bands be set aside

as a new "Experimental Segment" for non-traditional and experimental modes such as digitized data, voice and image, and other "forward looking" communications methods.

- C. I propose that the current power output level of 200W be retained for these segments, and additionally propose that transmitters in those segments must be equipped with auto-adaptive circuitry to reduce output to the lowest level consistent with reliable communications.
- D. I recommend that the Commission grant broad discretion to amateurs operating in this "experimental segment" as to innovative modulation schemes and non-traditional technologies.

Respectfully submitted,

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